IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

In the matter of:

In proceedings under

Chapter 13

FRANK J. KAMPY DBA SPECIALIZED MEDICAL SERVICES and Case No. 09-72798

CAROL KAMPY

Debtors

Judge MANUEL BARBOSA

NOTICE OF ELECTRONIC FILING AND CERTIFICATION OF SERVICE BY MAIL

PLEASE TAKE NOTICE that a Response to Notice of Payment of Final Mortgage Cure Amount in the above captioned matter has been electronically filed on January 10, 2012 with the U.S. Bankruptcy Court for NORTHERN District of Illinois and served electronically upon the following parties:

> /s/ Timothy R. Yueill By: Timothy R. Yueill, Esq.

Served upon the following parties electronically:

BRIAN A. HART LAW OFFICES PC, 1410 N. MAIN ST., ROCKFORD, IL 61103 - Counsel for Debtors LYDIA MEYER, P.O. BOX 14127, ROCKFORD, IL 61105 - Trustee PATRICK S. LAYNG, 780 REGENT ST., STE. 304, MADISON, WI 53715 - U.S. Trustee and served upon the following parties by mail:

FRANK J. KAMPY, 541 TERRACE DR., ALGONQUIN, IL 60102 - Debtor CAROL KAMPY, 541 TERRACE DR., ALGONQUIN, IL 60102 - Debtor

Certification of Service

I, the undersigned, an attorney, hereby certified that I have served a copy of this Notice along with the attached Response upon the parties listed above, as to the Trustees and Debtors' counsel via electronic through ECF on January 10, 2012, and as to the Debtors by causing same to be mailed in a properly addressed envelope, postage prepaid, in the U.S. Mail Chute at 175 North Franklin, Chicago, Illinois, before the hour of 5:00 p.m., on January 10, 2012.

By: /s/ Timothy R. Yueill

LAW OFFICES OF IRA T. NEVEL, LLC

175 North Franklin, Suite 201 Chicago, Illinois 60606 (312) 357-1125 ZCK

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE

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FRANK J. KAMPY
DBA SPECIALIZED MEDICAL SERVICES and
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Debtors

RESPONSE TO NOTICE OF PAYMENT OF FINAL MORTGAGE CURE

NOW COMES AMERICAN HOME MORTGAGE SERVICING, INC., DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SOUNDVIEW HOME LOAN TRUST 2006-OPT1, ASSET-BACKED CERTIFICATES, SERIES 2006-OPT1, a secured creditor herein, by and through its counsel, LAW OFFICES OF IRA T. NEVEL, LLC and in Response to the Trustee's *Notice of Payment of Final Mortgage Cure*, states as follows:

- 1. Respondent acknowledges that its Proof of Claim has been satisfied in full pursuant to the Trustee's disbursements through the Plan.
- 2. Respondent objects to treating the mortgage at issue as reinstated and fully current as the debtor has not made timely post petition mortgage payments.
- 3. That as of the approximate date of this timely Response, the Debtor was post petition due for December 2011 mortgage payment (with \$325.30 being held in suspense as insufficient to apply. (Copy of payment history is attached hereto as Ex. A).

Law Offices of Ira T. Nevel, LLC

/s/ Timothy R. Yueill

By: Timothy R. Yueill, Esq. Counsel for AMERICAN HOME MORTGAGE SERVICING, INC.

LAW OFFICES OF IRA T. NEVEL, LLC 175 North Franklin, Suite 201 Chicago, Illinois 60606 (312) 357-1125 ZCK